

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
v.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
Defendants.	§	

DEFENDANTS' MOTION TO FILE UNDER SEAL
RESPONSE TO PLAINTIFFS' JOINT PROPOSED FINDINGS OF FACT

Defendants file this Motion to File Under Seal their Response to Plaintiffs' Joint Proposed Findings of Fact. In support of this Motion, Defendants would respectfully show the following:

1. Today, Defendants filed their Response to Plaintiffs' Joint Proposed Findings of Fact, pursuant to the Court's order dated August 25, 2016. *See* ECF No. 922.

2. Through this Motion, Defendants seek to file under seal their Response to Plaintiffs' Joint Proposed Findings of Fact. Defendants request that an unredacted version of the filing be sealed because it contains references to evidence that has already been sealed by the Court. Defendants have filed a redacted version of the Response to Plaintiffs' Joint Proposed Findings of Fact with the Court.

3. The Court may seal court records if the interests favoring non-disclosure in a particular case outweigh the presumption in favor of the public's common-law

right of access to judicial records. *See, e.g., Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 597-98 (1978); *United States v. Amodeo*, 44 F.3d 141, 146-47 (2d Cir. 1995).

4. Defendants have conferred with Plaintiffs concerning the substance of this Motion. All Plaintiffs, except for the Texas Association of Hispanic County Judges and County Commissioners who have not responded to our request, have confirmed that they do not oppose the relief requested herein.

5. For the foregoing reasons, Defendants respectfully request that the Court permit Defendants to file under seal their Response to Plaintiffs' Joint Proposed Findings of Fact, which is attached as Exhibit A.

Date: December 16, 2016

Respectfully submitted.

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

BRANTLEY STARR

Deputy First Assistant Attorney General

JAMES E. DAVIS

Deputy Attorney General for Litigation

/s/ Angela V. Colmenero

ANGELA V. COLMENERO

Chief, General Litigation Division

MATTHEW H. FREDERICK

Deputy Solicitor General

OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548 (MC 059)

Austin, Texas 78711-2548

Tel.: (512) 936-6407

Fax: (512) 474-2697

Counsel for Defendants

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants conferred with counsel for Plaintiffs via email and telephone on December 16, 2016 regarding the relief requested in this Motion. Counsel for all Plaintiffs, except for the Texas Association of Hispanic County Judges and County Commissioners who have not responded to our request, have indicated that they do not oppose the relief sought in this Motion.

/s/ Angela V. Colmenero

ANGELA V. COLMENERO

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2016, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Angela V. Colmenero

ANGELA V. COLMENERO